

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

STANLEY LEE BROWN, JR., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:24cv00039
)	
THE CITY OF LYNCHBURG, et al.,)	
)	
Defendants.)	

ANSWER

Defendant, LPD Officer Garrett Waterman, by counsel, answers the Complaint as follows:

1. With regard to paragraphs 1-4, Defendant admits that jurisdiction and venue is correct in the Lynchburg Division of the United States District Court for the Western District of Virginia. Defendant denies that this Court has jurisdiction over the state law claims standing alone.
2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraphs 5 and 6.
3. Defendant admits the allegations contained in paragraphs 7 and 8.
4. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraphs 9 and 10.
5. Defendant denies the allegations contained in paragraphs 11-41.
6. With regard to the allegations contained in paragraph 11-41, Defendant affirmatively states that he lawfully detained and searched Plaintiffs, did not violate Plaintiffs'

constitutional rights, and used the minimum amount of force necessary, if any, to conduct the search of Plaintiffs.

7. Paragraph 42 contains no allegations against Defendant and therefore he is not required to respond to those allegations.

8. With regard to the allegations contained in paragraph 43, Defendant denies the allegations contained in subsections (a)-(d). The remaining subsections of paragraph 43 contain no allegations against Defendant and therefore he is not required to respond to those allegations.

9. Defendant denies the allegations contained in paragraphs 44-65.

10. Paragraphs 66-73 contain no allegations against Defendant and therefore he is not required to respond to those allegations.

11. To the extent the claim contained in paragraphs 74-79 is not dismissed, Defendant denies the allegations contained in those paragraphs.

12. Defendant denies the allegations contained in paragraphs 80-86.

13. Paragraphs 87-89 contain no allegations against Defendant and therefore he is not required to respond to those allegations.

14. Defendant denies the allegations contained in paragraph 90.

15. Paragraphs 91-94 contain no allegations against Defendant and therefore he is not required to respond to those allegations.

16. Defendant denies the allegations contained in paragraphs 95-117.

17. Paragraphs 118-125 contain no allegations against Defendant and therefore he is not required to respond to those allegations.

18. To the extent the claim contained in paragraphs 126-131 is not dismissed, Defendant denies the allegations contained in those paragraphs.

19. Defendant denies the allegations contained in paragraphs 132-138.
20. Paragraphs 139-141 contain no allegations against Defendant and therefore he is not required to respond to those allegations.
21. Defendant denies the allegations contained in paragraph 142.
22. Paragraphs 143-146 contain no allegations against Defendant and therefore he is not required to respond to those allegations.
23. Defendant denies all allegations not expressly admitted herein.
24. Defendant denies that he is indebted or liable to the Plaintiffs for the amounts or reasons set forth in the Complaint or any other amounts or reasons whatsoever.
25. Defendant is immune from suit or damages by the doctrines of sovereign, governmental, and/or qualified immunity.

OFFICER GARRETT WATERMAN

By: /s/ John R. Fitzgerald
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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of September, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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